

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: FRESENIUS GRANUFLO/
NATURALYTE DIALYSATE
PRODUCTS LIABILITY LITIGATION

This Document Relates To:

MDL No. 1:13-md-02428-W

Case No. 1:14-cv-14412-DPW

CAROL COOK, as next of kin to
EARL COOK, JR., deceased, et al.

Plaintiffs,

vs.

FRESENIUS USA, INC., et al.,

Defendants.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY TO
FMCNA'S OPPOSITION TO PLAINTIFFS' MOTION TO REMAND**

Plaintiffs respectfully seek leave of this Court to file a Reply to Defendant FMCNA's Opposition to Plaintiffs' Motion to Remand. In support thereof, Plaintiffs show the Court as follows:

1. Plaintiffs filed their Motion to Remand for Lack of Subject Matter Jurisdiction [Doc. 86] and Memorandum of Points and Authorities in Support of Remand [Doc. 87] on March 12, 2015.
2. Defendants filed their Opposition to Plaintiffs' Motion to Remand [Doc. 91] on March 27, 2015.
3. This Court previously established a deadline of April 3, 2015 for Plaintiffs to reply, with leave of Court, to Defendants' response to Plaintiffs' Motion to Remand.
4. FMCNA has raised new issues in its response to Plaintiffs' Motion to Remand that

require further response and clarification by Plaintiffs.

Therefore, Plaintiffs request that this Court enter an Order granting them leave to file a Reply to FMCNA's Opposition to Remand.

Respectfully submitted:

s/ Christopher J. Bergin

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Christopher Bergin, hereby certify that on March 27, 2015, a true and correct copy of the foregoing document filed through the ECF system will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those, if any, indicated as non-registered participants.

/s/ Christopher J. Bergin